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*Attorneys for Defendants,  
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH	)	
Individually and as Parent and Legal Guardian	)	<b>Case No. 2:23-cv-00118-KHR</b>
of W.W., K.W., G.W., and L.W., minor children	)	
and MATTHEW WADSWORTH,	)	
	)	
Plaintiffs,	)	<b>DEFENDANTS' PROPOSED</b>
	)	<b>SPECIAL VERDICT FORM</b>
v.	)	
	)	
WALMART INC. and	)	
JETSON ELECTRIC BIKES, LLC,	)	
	)	
Defendants.	)	
	)	

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Pursuant to the Final Pretrial Order (ECF No. 166, p. 9), Defendants Walmart, Inc. and Jetson Electric Bikes, LLC, by and through their undersigned counsel, submit this proposed Special Verdict Form to be submitted to the jury in the above-captioned matter.

We the jury, being duly impaneled and sworn upon oath, and all of us agreed upon the verdict, making the following answers to the questions submitted to us (NOTE: All of you must agree as to each answer).

1. Was Defendant Walmart Inc. negligent?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered “yes” to Question 1, please proceed to Question 2. If you answered “no” to Question 1, please proceed to Question 7.

2. Was Defendant Walmart Inc.’s negligence a cause (substantial factor) of injury to Plaintiff Stephanie Wadsworth?

Yes \_\_\_\_\_ No \_\_\_\_\_

3. Was Defendant Walmart Inc.’s negligence a cause (substantial factor) of injury to Plaintiff W.W.?

Yes \_\_\_\_\_ No \_\_\_\_\_

4. Was Defendant Walmart Inc.’s negligence a cause (substantial factor) of injury to Plaintiff K.W.?

Yes \_\_\_\_\_ No \_\_\_\_\_

5. Was Defendant Walmart Inc.’s negligence a cause (substantial factor) of injury to Plaintiff G.W.?

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Was Defendant Walmart Inc.’s negligence a cause (substantial factor) of injury to Plaintiff L.W.?

Yes \_\_\_\_\_ No \_\_\_\_\_

Regardless of how you answered Questions 1 through 6, please proceed to Question 7.

7. Was Defendant Jetson Electric Bikes, LLC negligent?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered “yes” to Question 7, please proceed to Question 8. If you answered “no” to Question 7, please proceed to Question 13.

8. Was Defendant Jetson Electric Bikes, LLC’s negligence a cause (substantial factor) of injury to Plaintiff Stephanie Wadsworth?

Yes\_\_\_\_\_ No\_\_\_\_\_

9. Was Defendant Jetson Electric Bikes, LLC’s negligence a cause (substantial factor) of injury to Plaintiff W.W.?

Yes\_\_\_\_\_ No\_\_\_\_\_

10. Was Defendant Jetson Electric Bikes, LLC’s negligence a cause (substantial factor) of injury to Plaintiff K.W.?

Yes\_\_\_\_\_ No\_\_\_\_\_

11. Was Defendant Jetson Electric Bikes, LLC’s negligence a cause (substantial factor) of injury to Plaintiff G.W.?

Yes\_\_\_\_\_ No\_\_\_\_\_

12. Was Defendant Jetson Electric Bikes, LLC’s negligence a cause (substantial factor) of injury to Plaintiff L.W.?

Yes\_\_\_\_\_ No\_\_\_\_\_

Regardless of how you answered Questions 1 through 12, please proceed to Question 13.

13. Was the hoverboard defectively designed?

Yes\_\_\_\_\_ No\_\_\_\_\_

14. Was the hoverboard defectively manufactured?

Yes\_\_\_\_\_ No\_\_\_\_\_

15. Did Defendants fail to provide adequate warnings, instructions, and information regarding the subject hoverboard?

Yes\_\_\_\_\_ No\_\_\_\_\_

If you answered “yes” to Question 13, 14, or, 15, please proceed to Questions 16 through 20. If you answered “no” Question 13, 14, and, 15, do not answer Questions 16 through 20 and proceed to Question 21.

16. Was the defective design, manufacturing, or inadequate warning of the subject hoverboard a cause (substantial factor) of Plaintiff Stephanie Wadsworth’s injuries?

Yes\_\_\_\_\_ No\_\_\_\_\_

17. Was the defective design, manufacturing, or inadequate warning of the subject hoverboard a cause (substantial factor) of Plaintiff W.W.'s injuries?

Yes \_\_\_\_\_ No \_\_\_\_\_

18. Was the defective design, manufacturing, or inadequate warning of the subject hoverboard a cause (substantial factor) of Plaintiff K.W.'s injuries?

Yes \_\_\_\_\_ No \_\_\_\_\_

19. Was the defective design, manufacturing, or inadequate warning of the subject hoverboard a cause (substantial factor) of Plaintiff G.W.'s injuries?

Yes \_\_\_\_\_ No \_\_\_\_\_

20. Was the defective design, manufacturing, or inadequate warning of the subject hoverboard a cause (substantial factor) of Plaintiff L.W.'s injuries?

Yes \_\_\_\_\_ No \_\_\_\_\_

21. Was Plaintiff Stephanie Wadsworth negligent?

Yes \_\_\_\_\_ No \_\_\_\_\_

If your answer to Question 21 is "yes," please proceed to Question 22. If your answer to Question 21 is "no," do not answer Questions 22 through 27 and proceed to Question 28.

22. Was Plaintiff Stephanie Wadsworth's negligence a cause (substantial factor) of injury to her injuries?

Yes \_\_\_\_\_ No \_\_\_\_\_

23. Was Plaintiff Stephanie Wadsworth's negligence a cause (substantial factor) of injury to W.W.?

Yes \_\_\_\_\_ No \_\_\_\_\_

24. Was Plaintiff Stephanie Wadsworth's negligence a cause (substantial factor) of injury to K.W.?

Yes \_\_\_\_\_ No \_\_\_\_\_

25. Was Plaintiff Stephanie Wadsworth's negligence a cause (substantial factor) of injury to G.W.?

Yes \_\_\_\_\_ No \_\_\_\_\_

26. Was Plaintiff Stephanie Wadsworth's negligence a cause (substantial factor) of injury to L.W.?

Yes \_\_\_\_\_ No \_\_\_\_\_

27. What percentage of total fault do you attribute to the parties? Your apportionment of fault must equal 100%

Plaintiff Stephanie Wadsworth	_____
Defendant Walmart Inc.	_____
Defendant Jetson Electric Bikes, LLC	_____

28. If you answered “yes” to Questions 2, 8, **or** 16, and without any deduction for percentages in Question 27 (if any), please state the total amount of damages Plaintiff Stephanie Wadsworth has proven to you by a preponderance of the evidence she suffered as a result of the fire?

\_\_\_\_\_ for past medical expenses

\_\_\_\_\_ for future medical expenses

\_\_\_\_\_ for pain and suffering

\_\_\_\_\_ TOTAL Compensation

29. If you answered “yes” to Questions 3, 9, **or** 17, and without any deduction for percentages in Question 27 (if any), please state the total amount of damages Plaintiff W.W. has proven to you by a preponderance of the evidence she suffered as a result of the fire?

\_\_\_\_\_ for past medical expenses

\_\_\_\_\_ for future medical expenses

\_\_\_\_\_ for pain and suffering

\_\_\_\_\_ TOTAL Compensation

30. If you answered “yes” to Questions 4, 10, **or** 18, and without any deduction for percentages in Question 27 (if any), please state the total amount of damages Plaintiff K.W. has proven to you by a preponderance of the evidence she suffered as a result of the fire?

\_\_\_\_\_ for past medical expenses

\_\_\_\_\_ for pain and suffering

\_\_\_\_\_ TOTAL Compensation

31. If you answered “yes” to Questions 5, 11, **or** 19, and without any deduction for percentages in Question 27 (if any), please state the total amount of damages Plaintiff G.W. has proven to you by a preponderance of the evidence she suffered as a result of the fire?

\_\_\_\_\_ for past medical expenses

\_\_\_\_\_ for pain and suffering

\_\_\_\_\_ TOTAL Compensation

32. If you answered “yes” to Questions 6, 12, or 20, and without any deduction for percentages in Question 27 (if any), please state the total amount of damages Plaintiff L.W. has proven to you by a preponderance of the evidence she suffered as a result of the fire?

\_\_\_\_\_ for past medical expenses

\_\_\_\_\_ for pain and suffering

\_\_\_\_\_ TOTAL Compensation

33. If you answered “yes” to Questions 2, 8, or 16, has Plaintiff Matthew Wadsworth proven he has lost consortium based upon his marriage to Stephanie Wadsworth?

If you answered “yes” to Question 33, please proceed to Question 34. If you answered “no” to Question 33, do not proceed to Question 34 and instead have the foreperson signed the verdict form below and notify the bailiff.

34. Without any deduction for percentages in Question 27 (if any), please state the total amount of damages Plaintiff Matthew Wadsworth has proven to you by a preponderance of the evidence he suffered as a result of the fire?

\_\_\_\_\_ for impairment to the marriage

\_\_\_\_\_ TOTAL Compensation

**PLEASE SIGN AND DATE THE SPECIAL VERDICT FORM AND INFORM THE BAILIFF THAT YOU HAVE REACHED YOUR VERDICT.**

Dated March \_\_\_\_, 2025.

\_\_\_\_\_  
Jury Foreperson

Dated this 24th day of February, 2025.

/s/ Holly L. Tysse

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